

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

RONALD GAINES, as Personal  
Representative for the Estate of  
RONALD POWERS, Deceased,

Plaintiff,

v.

Case No. 2:20-cv-11186  
Hon. Mark A. Goldsmith  
Mag. David R. Grand

COUNTY OF WAYNE, et al.,

Defendants.

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FIEGER, FIEGER, KENNEY &  
HARRINGTON P.C.  
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CHAPMAN LAW GROUP  
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**DEFENDANTS WELLPATH, LLC AND LATANYA MEADOWS, R.N.'S  
REQUEST FOR ATTORNEY'S FEES AND EXPERT FEES**

**EXHIBIT C**

**Chapman Law Group Billing Statements August 1, 2021-  
January 1, 2022**

## Chapman Law Group

1441 West Long Lake Road, Suite 310, Troy, MI 48098  
Telephone: (248) 644-6326  
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8/1/2021

**Invoice submitted to:**

Ronald Gaines v. County of Wayne et al

[REDACTED]  
[REDACTED]  
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**File No:02.06.55.22.CLG.20306**

In Reference To: Ronald Gaines v. County of Wayne et al

Invoice #31673

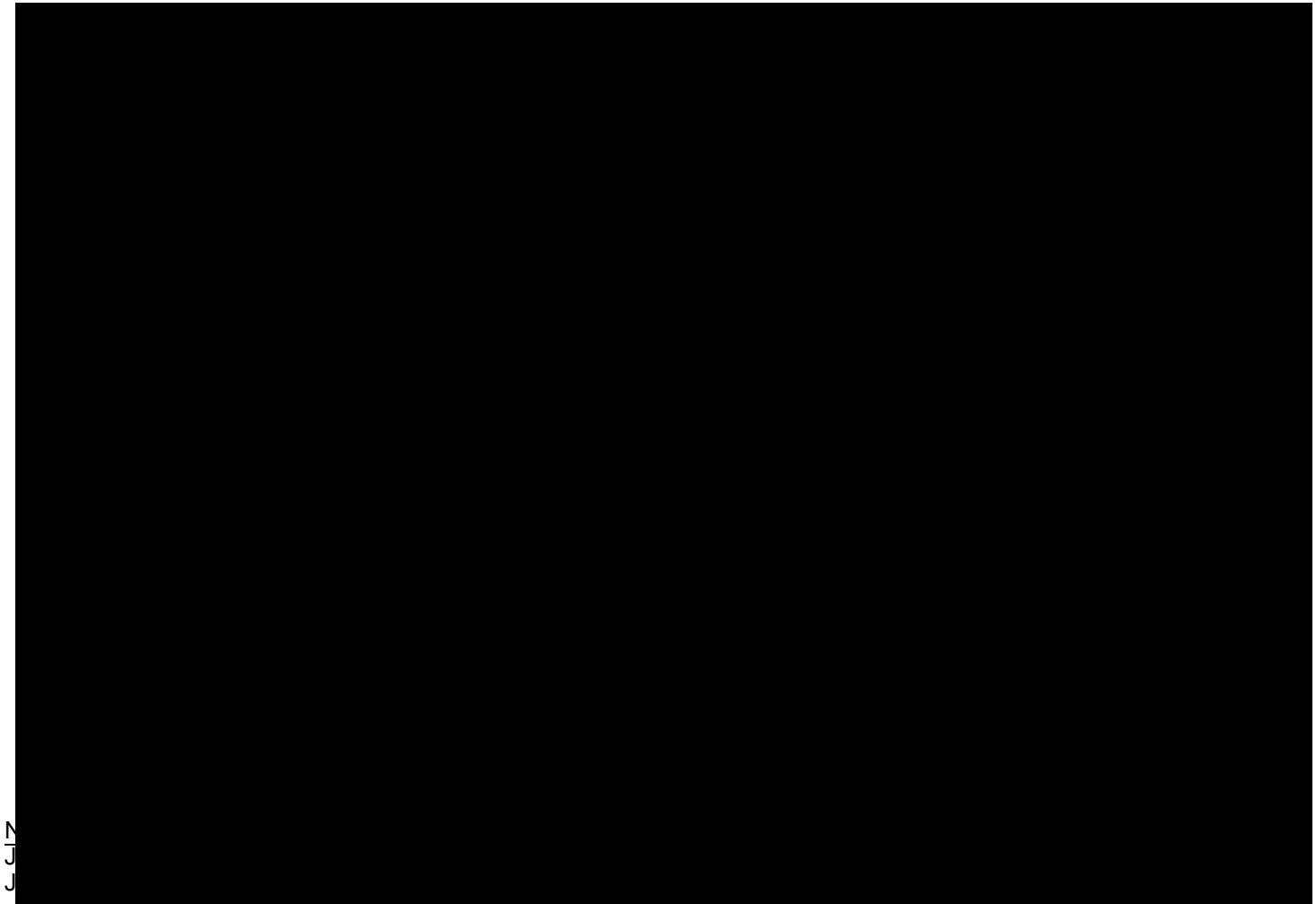
Professional Services

Hrs/Rate      Amount

Ronald Gaines v. County of Wayne et al

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			Hrs/Rate	Amount
7/22/2021	JL	Review/Analyze Received and reviewed Plaintiff's Rule 26 Expert Disclosures, including Betty Penderson-Chase, RN's disclosure the does not add any new allegations than were contained in the Affidavit of Merit.	0.80 215.00/hr	172.00
7/29/2021				
7/30/2021	JL	Communicate (Other External) Communicated with Nursing Expert Kimberly Pearson, RN. regarding expert disclosures which are currently due on August 23. informed her that we are currently waiting on the deposition transcripts of the defendants that were just taken last week. Sent her the following; Deposition of Plaintiff, dated January 5, 2021; Deposition of Decedent's Daughter, Roynetta Powers, dated April 14, 2021; Expert Report of Plaintiff's Nursing Expert, Betty Pederson-Chase, R.N.	0.40 215.00/hr	86.00



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9/1/2021

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**File No:02.06.55.22.CLG.20306**

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In Reference To: Ronald Gaines v. County of Wayne et al

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Invoice #32241

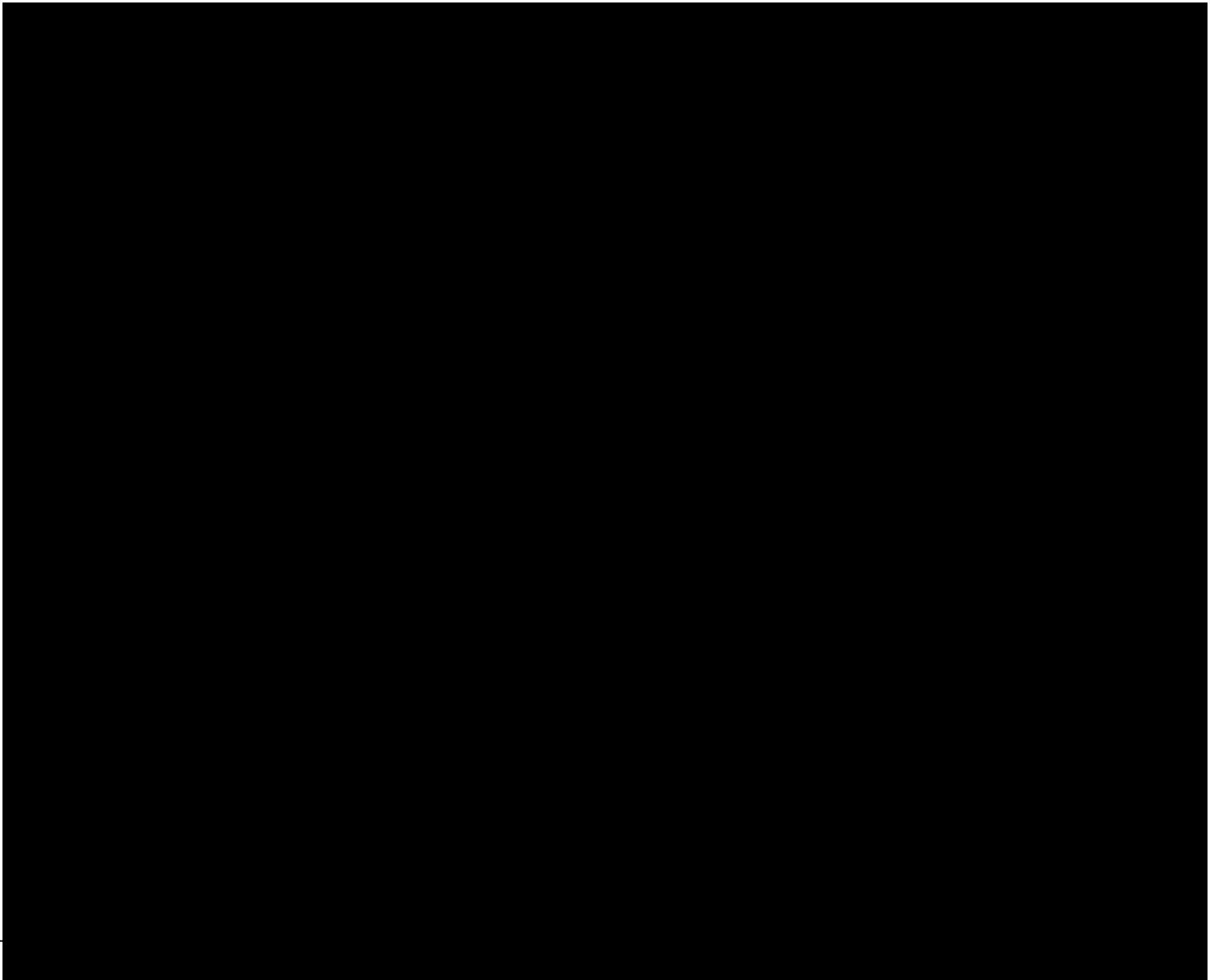
Professional Services

		<u>Hrs/Rate</u>	<u>Amount</u>
JL	Communicate (Other External) Communicated with Nursing Expert Polmstead regarding expert disclosures which are currently due on August 23. Informed her that we are currently waiting on the deposition transcripts of the defendants that were just taken and will sent current transcripts and Expert Report of	0.40 215.00/hr	86.00
JL	Plan and prepare for Planed and prepared for meeting with Nursing Expert Kin Pearson to discuss and assist her with the Rule 26 disclosure, which are due August 23, 2021. Focused on Plaintiff's allegations, their Expert disclosure and the Affidavit of Merit.	0.60 215.00/hr	129.00
JL	Communicate (Other External) Phone meeting with Kim Person, RN, our nursing expert in this matter, discussing her Rule 26 disclosure.	0.40 215.00/hr	86.00

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			Hrs/Rate	Amount
8/10/2021	JL	Communicate (Other External) Phone meeting with Pam Olmstead, RN nursing expert in this matter to discuss her Expert disclosure and the recent depositions in this matter	0.50 215.00/hr	107.50
	JL	Draft/Revise Drafted correspondence to Plaintiff's counsel requesting deposition dates of their expert, Betty Pederson-Chase, R.N. before the end of expert discovery.	0.20 215.00/hr	43.00
8/16/2021	JL	Review/Analyze Received and reviewed our expert, Nurse Pamela Omstead, Rn's expert disclosure. Made notes for our phone call to discuss.	0.80 215.00/hr	172.00
	JL	Review/Analyze Received and reviewed the expert disclosure of Kimberly Pearson, RN, our nursing expert in this case. Made notes for meeting to review and prepare to be sent out to all counsel.	1.20 215.00/hr	258.00
8/17/2021	JL	Expert Interviews/Reports/Prep Phone call with Nurse Olmstead regarding her proposed disclosure.	0.40 215.00/hr	86.00
8/18/2021	JL	Draft/Revise Drafted Defendants Wellpath, LLC, Latanya Meadows, R.N's expert disclosures pursuant to fed. R. Civ. P. 26(a)(2)(a) and prepared to file with court and all counsel.	1.60 215.00/hr	344.00
	JL	Review/Analyze Received and reviewed the revised exert disclosure by Pamela Olmstead, RN.	0.40 215.00/hr	86.00
8/20/2021	JL	Communicate (Outside Counsel) Phone call with Plaintiff's counsel discussing the outstanding discovery needed and how long we would need for an extension to the scheduling order.	0.20 215.00/hr	43.00



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10/1/2021

**Invoice submitted to:**

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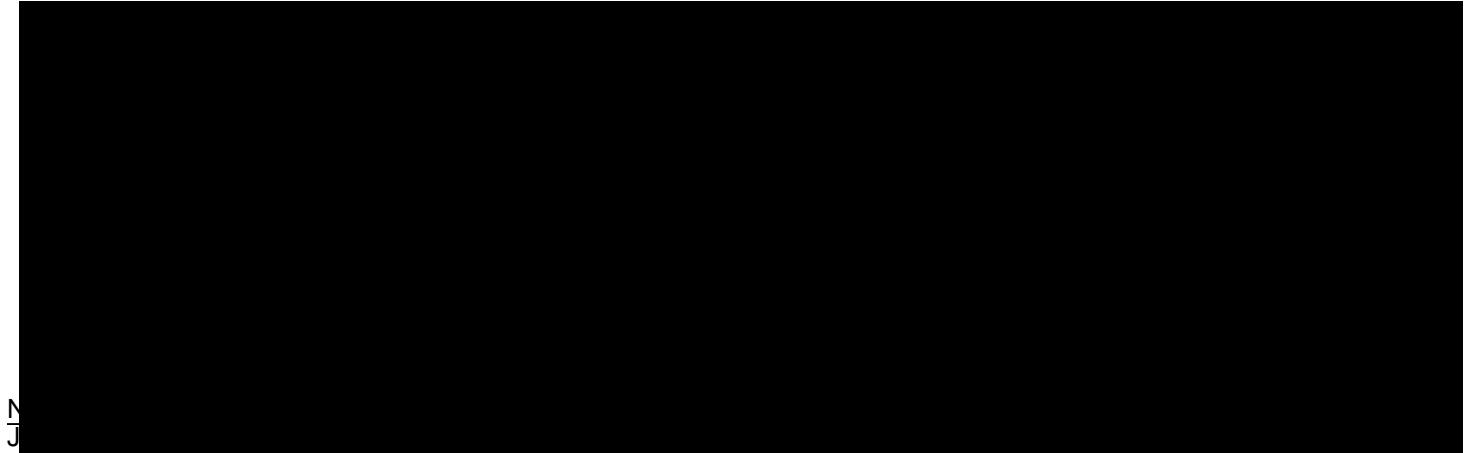
File No:02.06.55.22.CLG.20306

In Reference To: Ronald Gaines v. County of Wayne et al

Invoice #32790

## Professional Services

			Hrs/Rate	Amount
	JL	Communicate (Outside Counsel) Communicated with Plaintiff's counsel regarding the upcoming deposition of Nursing expert Chase and Plaintiff desire to cancel the deposition now that the judge granted the 60 days extension.	0.30 215.00/hr	64.50
	JL	Deposition (Prepare/Attend) In preparation of taking Plaintiff's nursing expert Chase's deposition, reviewed expert disclosure, CV and the NOI along with our Motion for Summary Judgment and started drafting questions relevant to Nurse Meadows dismissal.	1.50 215.00/hr	322.50
9/17/2021	JL	Communicate (Outside Counsel) Phone call with Plaintiff's counsel asking for deposition dates and dismissal of all claims except medical malpractice based on his experts disclosure.	0.30 215.00/hr	64.50
9/22/2021	JL	Communicate (Outside Counsel) Phone call with Plaintiff's counsel about scheduling their expert deposition. Was informed by counsel that they will be filing a emergency motion to get permission to change expert witness as their nursing expert is now unavailable.	0.30 215.00/hr	64.50



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11/1/2021

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**File No:02.06.55.22.CLG.20306**

In Reference To: Ronald Gaines v. County of Wayne et al  
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Invoice #33392

Professional Services

			Hrs/Rate	Amount
10/5/2021	JL	Review/Analyze Reviewed file now that 60 extension is coming to an end and requested Plaintiff's nursing expert deposition so we can file our Motion for Summary Judgment in a timely fashion.	0.30 215.00/hr	64.50
10/7/2021	JL	Communicate (Outside Counsel) Phone call with Plaintiff expert regarding changing experts and his new expert disclosure he just received. Informed him that I would not concur with his request and will seek costs associated with this last minute request.	0.40 215.00/hr	86.00
	JL	Review/Analyze Received and reviewed Plaintiff proposed new nursing expert, Ralf Sakle, RN expert disclosure and CV. Made notes of differences in the allegations.	1.40 215.00/hr	301.00
10/8/2021	JL	Research In preparation of filing a response to Motion to add expert witness, researched case law for failure to disclose Expert Witness pursuant to 26(a)(2)(c), what is good cause for new expert and how the 6th circuit has ruled on this issue.	1.20 215.00/hr	258.00
	JL	Draft/Revise Started Drafting response to Plaintiff's motion to add new expert witness and adjourn the scheduling order. Focused on the time line of events leading up to the motion.	0.80 215.00/hr	172.00
10/20/2021	JL	Review/Analyze Received and reviewed Plaintiff's motion to substitute nursing experts with 3 weeks left in expert discovery. Made notes for our response.	0.80 215.00/hr	172.00
10/22/2021	JL	Research Researched and reviewed cases cited in Plaintiff's motion for leave to substitute expert witness.	0.80 215.00/hr	172.00
	JL	Draft/Revise (work in progress) Started drafting response to Plaintiff's Motion for Leave to Substitute Expert Witness.	3.70 215.00/hr	795.50

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			Hrs/Rate	Amount
10/26/2021	JL	Draft/Revise (work in progress) continues working on our response to Plaintiff's Motion for Leave to Change Experts.	1.50 215.00/hr	322.50
10/27/2021	JL	Draft/Revise (work in progress) Finalized our response to Plaintiff Motion for Leave to Substitute Expert Witness and the brief in support of the response.	2.50 215.00/hr	537.50

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12/1/2021

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**File No:02.06.55.22.CLG.20306**

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In Reference To: Ronald Gaines v. County of Wayne et al

[REDACTED]

Invoice #33917

Professional Services

			Hrs/Rate	Amount
11/2/2021	JL	Draft/Revise Revised our response to Plaintiff's motion for leave to substitute their expert witness after finding case law on point. Pulled exhibits.	1.80 215.00/hr	387.00
11/12/2021	JL	Review/Analyze After reviewing CV of proposed expert witness, did some background investigation into what he actually did for Corizon and if he would qualify for as an expert witness. I was able to verify that he only held VP Operations positions while at Corizon with no clinic work. Thus he would be excluded under Michigan Law for expert witnesses in a malpractice and a dauber motion will be necessary if the Judge also for the substitution.	0.40 215.00/hr	86.00
11/17/2021	JL	Plan and prepare for In preparation for oral arguments regarding Plaintiff motion to substitute their expert witness in nursing/corrections dissected the two disclosures and noted all the different allegations towards Nurse Meadows and Wellpath.	2.20 215.00/hr	473.00

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			Hrs/Rate	Amount
11/19/2021	JL	Plan and prepare for In preparation of oral arguments on Plaintiff's motion to substitute expert witness, reviewed what constitutes good for not disclosing expert witness pursuant to Rule 26 and our responsive pleadings.	0.80 215.00/hr	172.00
	JL	Appear for/attend- Appeared for and argued against Plaintiff's Motion to Substitute their Expert Witness after their Witness indicated that she could no longer support her criticisms. Judge has ordered us to brief the differences in the two disclosures before ruling on the motion and request for costs.	0.90 215.00/hr	193.50
	RWC	Review/Analyze discussion with JL regarding court potential decision to allow Plaintiff to pull and expert and substitute after discovery.	0.40 215.00/hr	86.00

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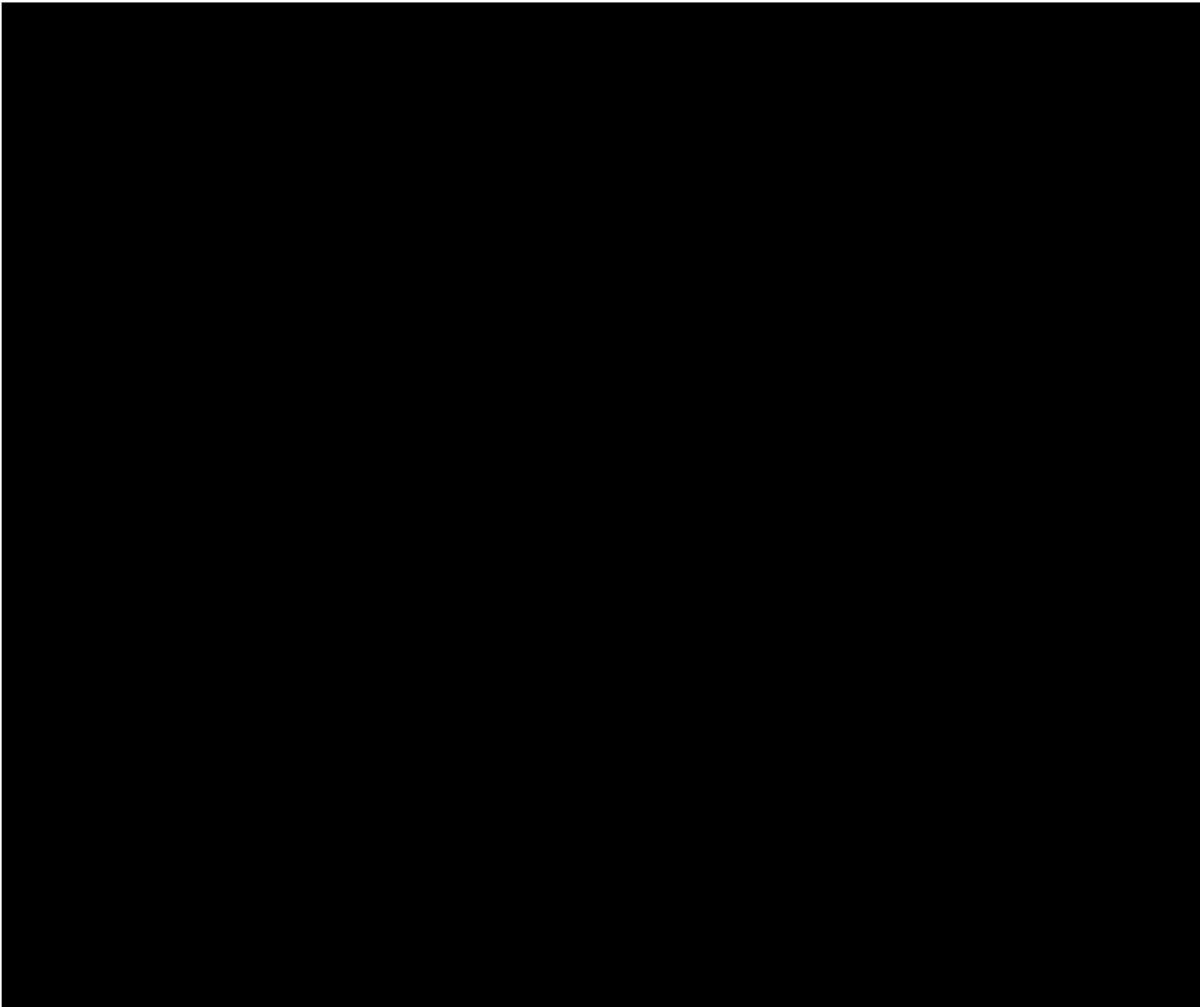
Invoice #34437

Professional Services

			Hrs/Rate	Amount
12/1/2021	JL	Draft/Revise Drafted supplemental brief at the request of the Court regarding he differences between Plaintiff's expert Chase's disclosure and their proposed new expert, Ralf Salke, Rn. Went through each document, pulling all facts and allegations used by the experts to form their opions and presented the different facts and opinions used by proposed expert to reshape the allegations in this case.	4.20 215.00/hr	903.00
12/10/2021	JL	Review/Analyze Received and reviewed Plaintiff's supplemental briefing in this matter along with the exhibits.	0.80 215.00/hr	172.00
12/20/2021	JL	Review/Analyze Received and reviewed opinion and order in this case regarding Plaintiff's motion to change experts. The Court granted Plaintiff's motion for leave to substitute expert witness. However, Plaintiff is required to pay the Wellpath Defendants' costs associated with the substitution.	0.40 215.00/hr	86.00

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